Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Call Authentication Trust Anchor	)	WC Docket No. 17-97

REPLY COMMENTS OF INCOMPAS

INCOMPAS, by its undersigned counsel, hereby submits these Reply Comments in response to questions posed in the Commission's Notice of Inquiry ("NOI") on implementing authentication standards for telephone calls, including the protocols and multi-phase framework developed by the Internet Engineering Task Force ("IETF"), Alliance for Telecommunications Industry Solutions ("ATIS"), and SIP Forum.[1]

I. INTRODUCTION

INCOMPAS is supportive of the Commission's efforts to eliminate illegal robocalls and has encouraged the agency to examine trusted identify frameworks, like the Signature-based Handling of Asserted Information using toKENs ("SHAKEN/STIR") model, as a potential solution for Caller ID authentication. However, despite the progress made by industry with respect to the SHAKEN/STIR framework, the record in this proceeding indicates that the model remains under development and has limitations that should preclude the Commission from mandating its adoption. INCOMPAS' members include wholesale providers and IP-enabled platforms whose competitive services may face discriminatory treatment given the "outstanding questions about whether either of the [SHAKEN/STIR] frameworks and standards will work

[1] *Call Authentication Trust Anchor*, WC Docket No. 17-97, Notice of Inquiry, FCC 17-89 (rel. July 14, 2017) ("Notice" or "NOI").

equally well with VoIP calls and traditional wireline calls."[2] INCOMPAS urges the Commission to allow industry the time necessary to finish its ongoing testbed and determine whether the framework can be implemented on networks using various types of technology before considering any additional implementation requirements.[3]

II. THE COMMISSION SHOULD NOT IMPOSE NEW REQUIREMENTS FOR IMPLEMENTING AUTHENTICATION STANDARDS FOR TELEPHONE CALLS.

Several INCOMPAS members have participated in the development and evaluation of the SHAKEN/STIR framework and standards. These companies believe that the framework has the potential to be an effective tool to protect consumers against illegal robocalls,[4] but also that "there remains significant work to be done before SHAKEN can be implemented as a reliable authentication method."[5] Primary among the concerns shared by our members is the potential for competitive providers to be subject to discriminatory treatment given the nature of the competitive services that they operate. For instance, VoIP providers and outward-bound calling

[2] Comments of the Voice on the Net Coalition, WC Docket No. 17-97 (filed Aug. 14, 2017), at 2. In SHAKEN/STIR's current iteration, an originating provider must have an operating company number ("OCN") in order for the calling party to receive full attestation. Without an OCN, the calling party will receive some degree of authentication less than full attestation. Interconnected VoIP providers that do not have OCNs (instead, relying on their CLEC partners) or non-interconnected VoIP providers who are not eligible for OCNs could be relegated to second-class status in terms of the authentication afforded to their customers' outgoing calls.

[3] *See* Comments of Telecordia Technologies, Inc. d/b/a/ iconectiv, WC Docket No. 17-97 (filed Aug. 14, 2017), at 3 ("iconectiv Comments").

[4] *See* Comments of Neustar, Inc., CG Docket No. 17-97 (filed Aug. 14, 2017), at 1 (describing the SHAKEN/STIR framework as "an extremely promising technique for detecting and deterring many unlawful robocallers").

[5] Comments of Microsoft Corporation, CG Docket No. 17-59 (filed July 3, 2017), at 17 (asserting that it would be premature for the Commission to express its approval or encourage implementation of the framework).

applications such as Skype Out and Viber Out are capable of placing calls to PSTN telephone numbers without assigning a telephone number to the calling party. As INCOMPAS discussed in its comments on the Commission's earlier Notice of Proposed Rulemaking and NOI on eliminating unlawful robocalls:[6]

> Any arrangement for, or approval of, a trusted identity framework, such as SHAKEN, must ensure that technologies that do not assign telephone numbers to callers will not be vulnerable to widespread blocking by other voice services. Furthermore, the Commission should follow its traditional technology-neutral approach and not promote any solution that could treat calls differently based on the technology by which the calls are transmitted.[7]

In its comments, iconectiv maintains that a Commission mandate is not necessary "to further the adoption and implementation of the SHAKEN call authentication framework."[8] Instead, it suggests that the Commission play "a role in facilitating the evolution of SHAKEN to support additional call originators not covered in the initial framework."[9] By taking on this important role, the Commission can ensure that the standards allow commensurate call authentication for calls originating with VoIP providers (including those without OCNs), wholesale platforms, and other IP-enabled services. Moving too quickly, and requiring the implementation of any authentication method that is not fair and non-discriminatory could have a serious impact on the reliability of the network and leave customers who value these competitive services wondering why their calls are not being answered or completed.

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[6] *Advanced Methods to Target and Eliminate Unlawful Robocalls*, CG Docket No. 17-59, Notice of Proposed Rulemaking and Notice of Inquiry, FCC 17-24 (rel. Mar. 23, 2017).

[7] INCOMPAS Comments, CG Docket No. 17-59 (filed June 30, 2017), at 13-14.

[8] iconectiv Comments at 3.

[9] *Id*. iconective also posits that "SHAKEN will likely roll out network by network which provides opportunity [ ] for it to evolve and include all stakeholders over time." This natural adoption of the framework, driven by consumers' "expectations about validated Caller ID," would appear to diminish the need for a government mandate.

Finally, as the Commission notes in the NOI, robocalling is a global problem with a significant portion of these fraudulent calls originating outside the country.[10] INCOMPAS remains concerned about the limitations of the SHAKEN framework in this regard. It is likely that bad actors will simply move more of their robocalling efforts overseas if the Commission adopts a series of technology mandates on industry that reduces their ability to complete domestic calls. As such, any consideration of this specific framework could require the Commission to couple its implementation requirements with a central role in securing international cooperation to address misuse of the telephone network. Until the SHAKEN/STIR model can authenticate international calls in ways that are equivalent to domestic calls from carriers with OCNs, the Commission should not impose implementation requirements that might diminish the utility of the network. Instead, the Commission may want to allow industry to continue using the framework in concert with other tools that providers are developing to eliminate unwanted and illegal robocalls.

III. CONCLUSION

Caller authentication methods, like the SHAKEN/STIR framework, will be an important tool for providers looking to protect their customers from fraudulent robocalls. However, given the current limitations to these techniques and concerns that legitimate call traffic may not receive adequate attestation, the Commission should refrain from imposing new requirements mandating their implementation.

[10] *See* NOI at ¶ 40.

Respectfully submitted,

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